

ABDUL BROWN,  
PLAINTIFF

CIVIL ACTION NO. 07-637

V.

JEFFREY BEARD et. al,  
DEFENDANTS

PLAINTIFF'S AFFIDAVIT IN OPPOSING TO DEFENDANT'S  
STATEMENT OF MATERIAL FACTS

PURSUANT TO RULE 56 (F) (1) (2) AND (3), FED. R. CIV. P. PLAINTIFF, ABDUL BROWN, BY AND THROUGH HIS ATTORNEY, RAYMOND N. SANCHAS, ESQUIRE AND HEREBY SUBMITS THIS AFFIDAVIT IN OPPOSING TO DEFENDANTS STATEMENT OF MATERIAL FACTS AND AVERS THE FOLLOWING:

1. PLAINTIFF WAS DENIED DUE PROCESS IN HIS PRC'S, DUE TO THE FACT STAFF ALREADY HAD THEIR MIND MADE UP THAT I'M NOT MENTALLY ILL AND DESERVED TO BE TORTURE, ABUSE, ASSAULTED. I WAS NOT GIVEN A OPPORTUNITY TO WHY I WAS BEING PLACED IN THE SMU TO CHALLENGE MY PLACEMENT. PSYCHIATRIST AND PSYCHOLOGIST I/E IN THEIR REPORTS FOR PLACEMENT IN PROGRAM, WHERE THERE IS NO SCHOOLING, EDUCATIONAL BOOKS, GED, PROGRAMMING, JOB PROGRAMS, NO COUNSELOR FOR TREATMENT FOR MY ILLNESSES.
2. PLAINTIFF WAS ASSAULTED, ABUSED, TORTURED WITH THE EBID STUN GUN, USE OF OLEORESIN CAPSICUM OUT OF RETALIATION TO CAUSE BRUTAL HARM TO A MENTAL AND ASTHMATIC PERSON THAT WAS PLACED IN RESTRAINT CHAIR, SHOCKED WHICH CAUSE PLAINTIFF TO VOMIT AND DEFECATE ON HIMSELF. LEFT BRUISES ON ANKLES, WRIST, AND THIGH WITH MALICIOUSLY INTENT TO CAUSE BODILY HARM TO ~~ABDUL~~ PLAINTIFF.

3. DEFENDANTS TRYING TO CONFUSE THE COURTS WITH PLAINTIFF'S MISCONDUCT HISTORY AND HIS EXTENSIVE AND VIOLENT MISCONDUCT HISTORY. PLAINTIFF HAS BEEN CHARGED WITH ASSAULT MISCONDUCT WHICH WAS FALSIFIED, PROPAGATED AND MISREPRESENTED TO PLACE HIM IN LTSU/SMU. PLAINTIFF WAS NEVER EVALUATED WHICH IS ALSO FALSIFIED AND PLAINTIFF MENTAL HEALTH NOTES.

4. PLAINTIFF FILED NUMEROUS GRIEVANCE WHICH HE WAS DENIED FOOD BY DEFENDANTS. DEFENDANTS TRYING TO USE ONE INCIDENT DECEMBER 12, 2005 AND IF YOU LOOK AT MY GRIEVANCES YOU'LL SEE THAT I'M NOT TALKING ABOUT THIS DATE. I WAS DENIED FOOD AS OF RETALIATION FOR FILING GRIEVANCES AND LAWSUITS.

5. PLAINTIFF DESTROYED HIS CELL BECAUSE HE WAS BEING STARVED AND HIS MENTAL ILLNESS WAS TRIGGERED BY DEFENDANTS ANTAGONIZING HIM. PLAINTIFF FOLLOWED ALL ORDER DURING THE STRIP SEARCH DEFENDANT REPOSKY USE O.C. KNOWING PLAINTIFF WAS ASTHMATIC TRYING TO KILL HIM. DEFENDANTS NEVER GAVE PLAINTIFF A SHOWER WHICH IS POLICY. NOT JUST WASH EYES. PLAINTIFF HAD TO DEAL WITH THESE CHEMICALS ON HIS BODY FOR SEVEN (7) DAYS WHICH IRRITATED HIS SKIN, BODY, EYES AND PRIVATE PARTS IN MALICE TO CAUSE PAIN AND SUFFERING.

6. PLAINTIFF WAS STRAPPED IN A TORTURE CHAIR WITH THE INTENT TO CUT OFF ALL BLOOD CIRCULATION KICKED, HIT, SHOCKED WITH THE EBIO ALL FROM BEHIND SO I COULDN'T SEE WHO IT WAS BUT I DO RECALL CLO JOHNSON SHOCKING ME WITH THE EBIO. NONE OF THIS WAS RECORDED CAUSE THEY KNEW THEY COULD COVER IT UP.

Case 1:09-cv-00633-EPD Document 136-1 Filed 01/27/11 Page 8 of 3  
7. ALL DEFENDANTS KETCHER GAVE THEM THE OK TO TIGHTEN THE RESTRAINTS WHICH MADE PLAINTIFF TO HAVE BLOOD CLOTS, CHANGE OF COLOR TO THE SKIN, URINATE AND DEFECATE ON HIMSELF. NOW PLAINTIFF ~~AND~~ SUFFERS FROM A ABNORMAL NERVE ACTIVITY, HIS ARM AND LEGS SHAKE WITHOUT HIS NOTICING IT.

8. PLAINTIFF IS BEING SEND BACK TO THE SMU JUST WAITING ON A BED SO MY INTJUNCTIVE RELIEF SHOULD STILL STAND. PLAINTIFF WAS ONLY ~~AND~~ TRANSFER TO THE FEDERAL DETENTION FOR COURT AND WAS RETURNED TO SCI FAYETTE ON OR AROUND DECEMBER 23, 2008. AND WAS TRANSFER OUT JULY 21, 2010 TO SCI FRACKVILLE WHERE NOW HE IS WAITING TO BE SEND BACK.

I DECLARE UNDER PENALTY OF PERJURY THAT THE INFORMATION CONTAINED HEREIN IS BASED UPON DIRECT KNOWLEDGE IF CALLED TO TESTIFY, AND FOREGOING IS TRUE AND CORRECT PURSUANT TO (28 U.S.C. § 1746) AND PENALTIES OF SECTION 4904 OF THE CRIME CODE (18 PA. § 4904). RELATING TO UNSWORN FALSIFICATION TO AUTHORITIES.

EXECUTED THIS 27 DAY  
OF JANUARY, 2011  
abdul Brown

ABDUL BROWN #DP2655  
SCI FRACKVILLE  
1111 ALTAMONT BOULEVARD  
FRACKVILLE, PA 17931  
SIGNED abdul Brown